



Louisville Metro Air Pollution Control District  
701 West Ormsby Avenue, Suite 303  
Louisville, Kentucky 40203-3137



## Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-0322-20-F

Plant ID: 0322

Effective Date: 01/26/2021

Expiration Date: 01/31/2026

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

<b>Source:</b> Anderson Finishing Solutions, Inc.	<b>Owner:</b> Anderson Hardwood Pellets, LLC
3138 Del Park Terrace	1381 Beech St.
Louisville, KY 40211	Louisville, KY 40211

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve months and no later than ninety days prior to the expiration date.


Emission limitations to qualify for non-major status:

Pollutant:	VOC	Total HAP	HAP
Tons/year:	<25 tpy	<12.5 tpy	<5 tpy

Application No.: See **Application and Related Documents** table.

Public Notice Date: 09/22/2020

Permit writer: Aaron DeWitt

DocuSigned by:  
  
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Air Pollution Control Officer  
1/26/2020

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**Permit Revisions and Changes**

<b>Permit No.</b>	<b>Public Notice Date</b>	<b>Issue Date</b>	<b>Change Type</b>	<b>Description/Scope</b>
99-01-F	06/03/2001	11/01/2001	Initial	Initial Permit Issuance
O-0322-14-F	11/11/2014	12/22/2014	Renewal	Renewal
O-0322-14-F (R1)	01/24/2018	02/27/2018	Signif.	Ownership change and General Conditions update (GHG limit is removed from General Conditions)
O-0322-20-F	09/22/2020 12/23/2020	01/26/2021	Renewal	Renewal and adding limit to become exempt from STAR

**Construction Permit Summary**

<b>Permit No.</b>	<b>Issue Date</b>	<b>Description</b>
70-04-C	10/31/2005	Two (2) UV cured coating lines with overspray reclaim/filter system
27-06-C	03/31/2007	Gardina Finish Systems 48" UV cured roll coating line
37-06-C	03/31/2007	Gardina Finish Systems 48" waterborne UV spray coat line
114-08-C	02/26/2008	New Col-Met paint booth
699-08-C	12/31/2008	New Col-Met off-line dry filter paint booth. Modification of 48" UV cure roll coat line

**Application and Related Documents**

<b>Document Number</b>	<b>Date</b>	<b>Description</b>
119709	9/30/2019	Application & SDS, requesting STAR exempt
143857	11/1/2019	Admin corrections request from District
126016	12/9/2019	FEDDOOP Renewal application
129682	12/20/2019	STAR exempt PTE calculations from company
143858	2/13/2020	Application questions from District
143828	5/15/2020	STAR exempt application and 9440-O
171549	9/4/2020	Email draft permit for company review
175859	10/23/2020	Company comments to FEDDOOP draft permit
180029	12/9/2020	Email draft permit for company review
180884	12/23/2020	Email company review of draft permit

## Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors</i> , published by U.S.EPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
(M)SDS	- (Material) Safety Data Sheet
NAICS	- North American Industry Classification System
NO <sub>x</sub>	- Nitrogen oxides
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate Matter less than 10 microns
PM <sub>2.5</sub>	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO <sub>2</sub>	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

### **Preamble**

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

### **General Conditions**

- G1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
- G2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
- G3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
- G4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-O.
- G5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
- G6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.

- G7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
- G8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.
- G9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 5 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 12.5 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.
- G10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 25 tons per year of any regulated pollutant, including particulate matter, PM<sub>10</sub>, PM<sub>2.5</sub>, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; or any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA. Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.
- G11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
- G12. Unless specified elsewhere in this permit, the owner or operator shall submit semi-annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All compliance reports shall include the following per Regulation 2.17, section 3.5.
- A certification statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete", and
  - The signature and title of a responsible official of the company.

The semi-annual compliance reports are due on or before the following dates of each calendar year:

<b><u>Reporting Period</u></b>	<b><u>Report Due Date</u></b>
January 1 - June 30	August 29
July 1 - December 31	March 1 of the following year

G13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

<b>Regulation</b>	<b>Title</b>
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance With Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emission Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
1.18	Rule Effectiveness
1.19	Administrative Hearings
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.06	Permit Requirements – Other Sources
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
3.01	Ambient Air Quality Standards
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.04	Particulate and Sulfur Dioxide Reduction Requirements
4.05	Hydrocarbon and Nitrogen Oxides Reduction Requirements
4.06	Carbon Monoxide Reduction Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

- G14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

<b>Regulation</b>	<b>Title</b>
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
2.17	Federally Enforceable District Origin Operating Permits
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.15	Chemical Accident Prevention Provisions
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards

- G15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
- G16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
- G17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District  
701 W. Ormsby Avenue, Suite 303  
Louisville, Kentucky 40203-3137***



**Emission Unit U1/U2: Coating System****Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
7.08	Standards of Performance for New Process Operations	1 through 3
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 3

<b>DISTRICT ONLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
5.00	Standards of Performance for New Process Operations	1, 2

**Equipment**

<b>Emission Point</b>	<b>Description</b>	<b>Install Date</b>	<b>Applicable Regulations</b>	<b>Control ID</b>	<b>Release ID</b>
E-1	Racetrack Spray Booth 1, make Leader Fan Industries (LFI), model BTA 36T 30200M, capacity 9.4 gal/hr	1987	7.08, 7.25	C1	S1
E-6	Racetrack Spray Booth 2, make Col-Met, model BAF-30, capacity 9.4 gal/hr	1987	7.08, 7.25	C5	S6
E-2	Racetrack Spray Booth 3, make Binks, model 30-690, capacity 9.4 gal/hr	1987	7.08, 7.25	C2	S2
E-3	Racetrack Spray Booth 4, make LFI, model BTA 36T 30750M, capacity 9.4 gal/hr	1987	7.08, 7.25	C3	S3
E-4 A/B	Electric drying oven/heaters (2 radiant heaters/elements), make Superior Radiant Products LTD, model UA125, capacity 125,000 Btu/hr each (IA)	1987	7.25	N/A	N/A
E-5	Off-line paint spray booth, make Col-met, model BAF-30, capacity 9.4 gal/hr	1987	7.08, 7.25	C5	S5
E-7	48" Roll Coat UV Cure Line, make Gardina, model Dual Tech 401, capacity 6 gal/hr	2006	7.08, 7.25	C6	fugitive

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
E-9	Spray coating UV line with oven, make Gardina, model Dual Tech Spray 401, capacity 12.5 gal/hr	2006	7.08, 7.25	C9	S9a (booth) S9b (oven 1) S9c (oven 2) S9d (oven 3)
E-10	Spray coating UV line, make Superfici, model Twin Spray, capacity 12.5 gal/hr <sup>1</sup>	2006	7.08, 7.25	C10	S10a (booth) S10b (oven 1) S10c (oven 2) S10d (oven 3)
E-11	Oven/Heater, make Giardina, one (1) model Laminar Oven and one (1) Jet Air Oven, burner make Frostfighter, model IDF500 Indirect Gas heater (provides hot air to both ovens), capacity 0.42 MMBtu/hr (IA)	1987	7.25	N/A	S9 & S10

### Control Devices

Control ID	Description	Control Efficiency
C1	Dry Filters	98%
C2	Dry Filters	98%
C3	Dry Filters	98%
C5	Dry Filters	98%
C6	Indoor Exhausting Bag Collector	98%
C9	Overspray filter, make Paint Pockets, model Green Overspray Arrestor	98%
C10	Overspray filter, make Paint Pockets, model Green Overspray Arrestor	98%

<sup>1</sup> Coating line has two (2) Cefla Laminar ovens and one (1) Jet Air oven that are currently inactive per comments submitted 10/23/2020.

## U1/U2 Specific Conditions

### S1. Standards

[Regulation 2.17, section 5.1]

#### a. HAP

- i. The owner or operator shall not allow or cause the plantwide emissions of any single HAP to equal or exceed 5 tons during any consecutive 12-month period.<sup>2</sup> [Regulation 5.00, section 1.13.5.2]
- ii. The owner or operator shall not allow or cause the plantwide total HAP emissions to equal or exceed 12.5 tons during any consecutive 12-month period.<sup>1</sup> [Regulation 5.00, section 1.13.5.2]

#### b. Opacity

The owner or operator of E1, E2, E3, E5, E6, E7, E9 and E10 shall not allow visible emissions to equal or exceed 20% opacity. [Regulation 7.08, section 3.1.1]

#### c. PM

The owner or operator shall not allow PM emissions from E1, E2, E3, E5, E6, E7, E9 and E10 to exceed 2.34 lb/hr per piece of equipment based on actual operating hours in a calendar day.<sup>3</sup> [Regulation 7.08, section 3.1.2]

#### d. VOC

The owner or operator shall not allow or cause plantwide VOC emissions, including all coatings, additives, catalysts, solvents, thinners, and cleaners from all affected facilities subject to Regulation 7.25 to exceed 25 tons during any consecutive 12-month period.<sup>1, 4</sup>  
[Regulation 7.25, section 2.1] [Regulation 5.00, section 1.13.5.1]

### S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

#### a. HAP

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<sup>2</sup> On 5/15/2020, Anderson Finishing Solutions requested the limits for criteria pollutant VOC <25 tpy, Total HAP <12.5 tpy, and largest Single HAP <5.0 tpy to qualify as exempt from STAR, as defined by Regulation 5.00, section 1.13.5.

<sup>3</sup> Using the minimum spray gun transfer efficiency of 65%, the percent solids of the material 45.9%, and the efficiency of the filters (greater than 90%), the PM emission limit of the spray booths cannot be exceeded.

<sup>4</sup> The <40 tpy VOC limit is now a <25 tpy limit in order to be exempt from STAR per Regulation 5.00, section 1.13.5.1.

The owner or operator shall calculate and record the plantwide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

**b. Opacity**

- i. The owner or operator shall inspect the filters C1, C2, C3, C5, C9, and C10 in the spray booths at least monthly to ensure proper installment (i.e. proper alignment/placement, gaps, etc.) and replace as needed.
- ii. The owner or operator shall keep a record that shows the date and the name of the person who inspected the filters and if filters were replaced.

**c. PM**

See Opacity Monitoring and Record Keeping.

**d. VOC**

- i. The owner or operator shall, monthly, record the total amount used in gallons of each coating, solvent, cleaner, etc. and calculate the amount of VOC containing material used during the 12 consecutive month period.
- ii. The owner or operator shall maintain a copy of the safety data sheets (SDS) for each VOC containing material used at this plant.

**S3. Reporting**

[Regulation 2.17, section 5.2]

The owner or operator shall semi-annually report the following information, as required by General Condition G12:

**a. HAP**

The plantwide consecutive 12-month emissions of each single HAP and total HAP for each month in the reporting period.

**b. Opacity**

Any deviation from the requirements to perform monthly visible inspections of the paint booth PM filter system.

**c. PM**

See Opacity reporting.

**d. VOC**

The total plantwide 12 consecutive month VOC emissions for each month in the reporting period.

### Insignificant Activities

Equipment	Qty.	PTE (ton/yr)	Regulation Basis
Electric Drying Oven/Heater, Superior Radiant Products LTD/UA125, capacity 0.125 MMBtu/hr each (EU U1/U2, EP E-4 A/B)	2	NO <sub>x</sub> 2.13 PTE total	Regulation 1.02, Appendix A section 1.1
Heater, Roberts Gordon Compact Radiant Heater, model BH-200, capacity 0.2 MMBtu/hr	1		Regulation 1.02, Appendix A section 1.1
Laminar and Jet Air Oven Burner, capacity 0.42 MMBtu/hr (EU U1/U2, EP E-11)	1		Regulation 1.02, Appendix A section 1.1
Room Heater, capacity 0.1 MMBtu/hr	1		Regulation 1.02, Appendix A section 1.1
Bonanza Air Makeup Unit, HVAC, capacity 2.2 MMBtu/hr	1		Regulation 1.02, Appendix A section 1.1
HVAC, Modine #1-#6, capacity 0.2 MMBtu/hr each	6		Regulation 1.02, Appendix A section 1.1
HVAC, Office heater, capacity 0.1 MMBtu/hr	1	NO <sub>x</sub> 0.04 PTE	Regulation 1.02, Appendix A section 1.1

1. Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.
2. Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.
3. The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15<sup>th</sup>.
4. Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
5. The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.
6. The District has determined that no monitoring, recordkeeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.